

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

WAPP TECH LIMITED PARTNERSHIP and
WAPP TECH CORP.,

Plaintiffs,

V.

BANK OF AMERICA, N.A.,

Defendant.

[illegible]

Case No. 4:21-cv-00670-ALM

JURY TRIAL DEMANDED

Declaration of Kelsi Stayart White

1. My name is Kelsi Stayart White. My date of birth is March 9, 1990, and my business address is 1221 McKinney St., Suite 2500, Houston, Texas 77010. The facts within this Declaration are within my personal knowledge and true and correct.

2. I am an attorney at the law firm of Ahmad, Zavitsanos & Mensing, P.C., located at 1221 McKinney St., Ste. 2500, Houston, Texas 77010. I am licensed in and in good standing in the state of Texas. I am counsel for the Plaintiffs in the above-captioned case.

3. I am familiar with the following documents from my representation of the Plaintiffs in this case. The below exhibits, which are submitted with the Plaintiffs' Amended Motion for Partial Summary Judgment on the Invalidity Defense Regarding the '192, '678, and '864 Patents, are true and correct copies of the original filings, documents, or transcripts.

Exhibit	Description
Exhibit 1	Bank of America’s Motion for Stay, Dkt. 12, from the First Bank Suit (Case No. 4:18-cv-00519-ALM)
Exhibit 2	Bank of America’s Second Motion for Stay, Dkt. 134, from the First Bank Suit
Exhibit 3	Bank of America’s Reply in support of Motion for Stay, Dkt. 15, from the First Bank Suit
Exhibit 4	Bank of America’s Notice of Service of P.R. 3-3 Invalidity Contentions, Dkt. 41, with Invalidity Contentions attached, served on December 20, 2019.
Exhibit 5	Transcript from <i>Markman</i> Hearing on April 20, 2020

Exhibit 6	Bank of America's Invalidity Contentions, served on Feb. 10, 2022
Exhibit 7	Bank of America's P.R. 4-2 Preliminary Claim Constructions and Extrinsic Evidence, served on March 10, 2022
Exhibit 8	Wapp's P.R. 4-2 Preliminary Claim Constructions and Extrinsic Evidence, served on March 10, 2022
Exhibit 9	Proposed Joint Pretrial Order, Dkt. 319, in the MicroFocus Suit (Case No. 4-18-cv-00469)
Exhibit 10	Excerpts from Trial Transcript in the MicroFocus Suit, Dkts. 470-478
Exhibit 11	Memorandum Opinion and Order, Dkt. 486 in MicroFocus Suit
Exhibit 12	Final Judgment, Dkt. 487 in MicroFocus Suit

4. I declare under penalty of perjury that the foregoing is true and correct under 28 U.S.C. § 1746.

Executed in Harris County, State of Texas, on April 6, 2022.



Kelsi Stayart White